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Attorneys for Plaintiff  
*Javier Santiago*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

JAVIER SANTIAGO, individually and on behalf of all others similarly situated.

Plaintiff.

V.

STASH INVESTMENTS LLC, a  
Delaware limited liability company;  
and DOES 1 to 10, inclusive.

## Defendants.

Case No. 2:23-cv-05087-DSF-JPR

## NOTICE OF SETTLEMENT

Judge: Hon. Dale S. Fischer

Complaint Filed: June 27, 2023

## **NOTICE OF SETTLEMENT**

2 Pursuant to Local Rule 40-2, Plaintiff Javier Santiago (“Plaintiff”) hereby  
3 notifies this Honorable Court that the parties have reached an agreement in  
4 principle to settle this case. The parties’ settlement provides for this case to be  
5 dismissed (i) with prejudice as to Plaintiff’s individual claims, and (ii) without  
6 prejudice as to the class allegations. *See Judge Virginia A. Phillips, et al., Rutter*  
7 *Group Prac. Guide Fed. Civ. Pro. Before Trial Ch. 10-C ¶ 10:790 (2022 ed.)*  
8 (“Cases filed as purported class actions often settle *without having been certified*  
9 as such. The settlement agreement may provide only for the named plaintiffs’  
10 individual claims and require the class action allegations to be dismissed without  
11 prejudice. There is no requirement of judicial approval for precertification  
12 dispositions. The reason is that absent class members generally have no notice of  
13 uncertified class actions and therefore cannot be bound or deemed to have relied  
14 thereon.”) (emphasis in original) (citing Adv. Comm. Notes to 2003 Amendments  
15 to Fed. R. Civ. P. 23).

16 The parties, through counsel, are working cooperatively to consummate a  
17 long-form settlement agreement. The parties anticipate filing a stipulation for  
18 dismissal within 30 days.

19 | DATED: August 18, 2023

Respectfully submitted,

## KJC LAW GROUP, A.P.C.

By: /s/ Kevin J. Cole

Attorneys for Plaintiff  
*Javier Santiago*

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing document on all parties of record via the Court's CM/ECF system.

DATED: August 18, 2023

Respectfully submitted,

## KJC LAW GROUP, A.P.C.

By: /s/ Kevin J. Cole

Attorneys for Plaintiff  
*Javier Santiago*